

August 2, 2006

Linda Bluestein
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
FreedomCAR and Vehicle Technologies Program
Mailstop EE-2G Room 5F-034
1000 Independence Avenue, SW
Washington, DC 20585-0121

RIN 1904-AB66

Dear Ms. Bluestein:

The National Rural Electric Cooperative Association (NRECA) is the national service organization representing the 930 rural electric cooperatives providing central station electricity to more than 39 million consumer-owners in 47 states. NRECA provides these comments on behalf of its member systems.

We applaud the Department of Energy for its efforts in the proposed rulemaking to implement section 514 of the Energy Policy Act of 1992, as amended by section 703 of the Energy Policy Act of 2005. We support section 703, which provides flexibility by allowing States and alternative fuel providers to request a waiver of the alternative fueled vehicle (AFV) acquisition requirements. This flexibility allows them to take other actions to reduce annual petroleum motor fuel consumptions. We commend the DOE staff for its efforts in developing this proposed rule reflecting the intent of Congress.

The very helpful workshop that you and your staff organized did bring out a number of points that needed clarification. We agree with the comments that arose during the workshop, and ask that you clarify or look further at the following:

- The proposed rule asks that a waiver be submitted no later than March 31 of the year for the waiver request. Since auto models and light trucks are not introduced until early fall, the March date should be delayed. A suggestion would be to move the date to July 31, and allow an amendment, should the fall models be different from those proposed by the applicant;
- The proposed rule also requires that the waiver include a certification by a responsible official. We suggest that DOE provide a standard certification form for all waivers. This could be included in the Guidance Documents when developed;
- Many of the workshop attendees suggested expanding the alternative fueled vehicles to include other vehicles that were not covered, such as fork lifts, which could convert to biodiesel or future electric drives. We agree with that suggestion. Expanded use of biodiesel is an excellent way to reduce petroleum consumption; and
- The proposed rule or the guidance document should contain more information on the use of existing credits as opposed to a request for a waiver.

NRECA supports DOE's proposed rulemaking and wishes to express its appreciation for the opportunity to review and comment on the proposal.

Sincerely

John Holt
Senior Manager, Generation and Fuels
Energy Policy
National Rural Electric Cooperative Association